

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

GREAT NORTHERN INSURANCE
COMPANY,

Plaintiff,

v.

EL LEGADO PROPERTY MANAGEMENT
COMPANY, INC., et al.

Defendants.

CIVIL NO.: 3:11-cv-01303

**PLAINTIFF’S MOTION FOR LEAVE
TO ALLOW COUNSEL JOSEPH F. RICH, ESQUIRE TO PARTICIPATE
IN THE INITIAL SCHEDULING CONFERENCE ON APRIL 16, 2012 BY TELEPHONE**

Now comes Plaintiff, Great Northern Insurance Company (“Great Northern”), through its undersigned counsel, and respectfully moves this Honorable Court for leave to allow Plaintiff’s counsel, Joseph F. Rich, Esquire, to participate in the Initial Scheduling Conference on April 16, 2012 at 5 p.m. by Telephone.

1. On February 1, 2012, the Court reset the Initial Scheduling Conference in this case for Monday, April 16, 2012 at 5 p.m. (Docket No. 51) after a request to re-schedule from Defendant Real Legacy Assurance Company, Inc. (“Real Legacy”) (Docket No. 50).

2. On March 2, 2012, Plaintiff filed its Opposition to Defendant Real legacy’s Motion to Dismiss and Request for Relief under Rule 56(d), in which Plaintiff also requested the opportunity to present arguments concerning Defendant’s Motion at the time of the Initial Scheduling Conference. (Docket No. 54).

3. Plaintiff’s counsel, Joseph F. Rich, Esquire, is unable to rework his calendar to allow for travel from Philadelphia, Pennsylvania to San Juan, Puerto Rico for the conference on

April 16, 2012, and therefore Plaintiff respectfully requests that Mr. Rich be allowed to participate in the Initial Scheduling Conference by Telephone.

4. Plaintiff's local counsel, Roberto Abesada-Agüet, Esquire, will be attending the Initial Scheduling Conference in person on April 16, 2012 and will be prepared to assist Mr. Rich in addressing scheduling matters and Plaintiff's Opposition to Defendant's Motion to Dismiss.

5. Plaintiff respectfully requests that Mr. Rich be allowed to participate in the Initial Scheduling Conference by telephone.

RESPECTFULLY SUBMITTED.

The undersigned attorney hereby certifies that counsel of record was notified via the Court's ECF System which will electronically email this motion to them.

In San Juan, this 13TH day of March, 2012.

CORREA-ACEVEDO LAW OFFICES, P.S.C.
ATTORNEYS FOR
GREAT NORTHERN INSURANCE COMPANY
Centro Internacional de Mercadeo II
Guaynabo, Puerto Rico 00968
Tel. (787) 273-8300
Fax. (787) 273-8371
email: ra@correaacevedo.com

s/Roberto Abesada-Agüet
USDC-PR No. 216706

CO-COUNSEL:
Joseph F. Rich, Esquire
James P. Cullen, Jr., Esquire
COZEN O'CONNOR
1900 Market Street
The Atrium - Third Floor
Philadelphia, PA 19103
(215) 665-7185